

The court incorporates by reference in this paragraph and adopts as the findings and orders of this court the document set forth below. This document was signed electronically at the time and date indicated, which may be materially different from its entry on the record.



Dated: 08:35 AM November 24, 2021

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:) Chapter 11
Squirrels Research Labs LLC *et al.*,¹) Case No. 21-61491
Debtors.) (*Request for Joint Administration Pending*)
) Judge Russ Kendig

**ORDER APPROVING MOTION TO SHORTEN TIME TO RESPOND TO,
AND EXPEDITE THE HEARING ON THE MOTION FOR AN ORDER
(A)(I) ESTABLISHING AND APPROVING BID PROCEDURES RELATED
TO THE SALE OF CERTAIN OF THE DEBTORS' ASSETS PURSUANT TO 11 U.S.C.
§ 105(A), INCLUDING THE DESIGNATION OF A STALKING HORSE BIDDER
AND RELATED BID PROTECTIONS; (II) APPROVING CONTRACT/LEASE
ASSUMPTION AND ASSIGNMENT PROCEDURES AND THE FORM AND NOTICE
THEREOF; (III) SCHEDULING THE AUCTION; (IV) SCHEDULING A HEARING
AND OBJECTION DEADLINE WITH RESPECT TO THE SALE; (V) APPROVING
THE FORM AND NOTICE THEREOF; AND (VI) GRANTING RELATED RELIEF;
AND (B)(I) AUTHORIZING SALE OF CERTAIN OF DEBTOR'S PROPERTIES FREE
AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS
PURSUANT TO 11 U.S.C. §§ 105 AND 363; AND (II) APPROVING
ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS
AND UNEXPIRED LEASES; AND (C) GRANTING RELATED RELIEF**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

This matter came to be considered on the Motion (the “**Motion**”) of the above-captioned debtors and debtors-in-possession (each a “Debtor” and collectively, the “Debtors”), in the above-captioned Chapter 11 cases (the “Cases”), for an Order Pursuant to sections 102 and 105 of the Bankruptcy Code, Rules 2002(a)(6), 9006(c) and 9007 of the Bankruptcy Rules, and Rule 9013-1 of the Local Rules to Shorten the Response Time and Expedite the Hearing for the Motion for an Order: (A)(I) Establishing and Approving Bid Procedures Related to the Sale of the Debtor’s Properties Pursuant to 11 U.S.C. § 105(A), Including the Designation of Stalking Horse Bidder and Related Bid Protections; (II) Approving Contract/Lease Assumption and Assignment Procedures and the Form and Notice Thereof; (III) Scheduling the Auction; (IV) Scheduling a Hearing and Objection Deadline with Respect to the Sale; (V) Approving the Form and Notice Thereof; and (VI) Granting Related Relief; and (B)(I) Authorizing Sale of Debtor’s Properties Free and Clear of Liens, Claims, Encumbrances, and Interests Pursuant to 11 U.S.C. §§ 105 and 363; and (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (C) Granting Related Relief (the “**Sale Motion**”). The Court, having reviewed the Motion, finds as follows: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (c) this Court is the proper venue for this Chapter 11 case and the Motion pursuant to 28 U.S.C. §§ 1408 and 1409 and the Local Bankruptcy Rules; (d) notice of the Motion was sufficient and proper under the circumstances; and (e) the legal and factual bases set forth in the Motion establish just cause for the relief granted herein.

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Capitalized Terms not otherwise defined herein shall have the meanings given to them in the Sale Motion.

3. Cause exists to shorten the time to respond to the Sale Motion. Responses to the Sale Motion will be due **November 30, 2021 by 11:59 p.m. (EST)**.

4. An expedited hearing on Sale Motion on will be set for **December 1, 2021 at 2:00 p.m. (EST) (the “Hearing”)**. The Hearing will be held **telephonically** in the Bankruptcy Courtroom at the Ralph Regula Federal Building and U.S. Courthouse, 401 McKinley Ave SW, Canton, Ohio 44702, **Dial In: (888) 684-8852; Access Code: 3303949#.**²

#

SUBMITTED BY:

/s/ Julie K. Zurn
Marc B. Merklin (0018195)
Julie K. Zurn (0066391)
BROUSE McDOWELL, LPA
388 S. Main Street, Suite 500
Akron, Ohio 44311
Telephone: (330) 535-5711
Facsimile: (330) 253-8601
mmerklin@brouse.com
jzurn@brouse.com

*Proposed Counsel for the Debtor
and Debtor-in-Possession*

² For further details on telephonic participation, please refer to Judge Kendig’s Notice of Telephonic Hearing Procedure, dated March 18, 2020, at <https://www.ohnb.uscourts.gov/sites/default/files/memoranda/telephonic-hearing-procedure-31820.pdf>